



**City of Riverside**  
**Community & Economic Development Department**  
Planning Division

*City of Arts & Innovation*

September 13, 2019

Kome Ajise  
Executive Director  
Southern California Association of Governments  
900 Wilshire Blvd., Ste. 1700  
Los Angeles, CA, 90017

Dear Kome Ajise:

The City of Riverside appreciates the Southern California Association of Government's (SCAG) effort to consider multiple Regional Housing Needs Assessment (RHNA) methodologies, and thanks SCAG for undertaking a transparent process.

The City's Planning Division is pleased to provide you with our comments. The Planning Division recognizes that the RHNA allocation has significant implications for all jurisdictions in the SCAG region; therefore our comments focus on regional planning considerations, rather than local nuances. Our comments include the following:

1. The methodology must reflect recent changes in State law. In the past, the region was only obligated to accommodate housing; now the region is essentially obligated to construct housing. The 6<sup>th</sup> Cycle RHNA allocation must reflect a methodology focused on the new challenges.
2. The methodology must reflect and be incorporated in SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).
3. Of the three methodologies provided, the City supports Alternative 2, with modifications.
  - a. The distribution of RHNA units must factor in regional employment centers. Currently, residents from inland communities disproportionately commute to business centers in Los Angeles and Orange County. Not incorporating regional employment centers in housing allocation continues and increases this daily migration, which is contrary to existing regional planning efforts, such as the RTP/SCS. Placing housing near regional employment centers will reduce congestion, freeway expenditures, and greenhouse gas (GHG) emissions. It will also increase workforce productivity in the region, and help attracting and retain Southern California businesses.
  - b. The City would also suggest that Alternative 2 increase its distribution of housing near High Quality Transit Areas (HQTA), which is currently at 20%. Furthermore, it is recommended that the HQTA distribution be determined based on the region's need for housing near transit, not an arbitrary percentage. For instance, the percentage of housing obligated to QTAs

could be based on the ridership needed to make public transit systems fiscally sustainable; or it could relate to the reductions in vehicle miles traveled (VMT) that are needed to achieve the State's 2030 GHG emission goals. This second example is particularly relevant, since transportation in 2018 contributed approximately 41% of all statewide GHG emissions.

4. While City staff supports SCAG's efforts to incorporate "local input" into the RHNA distribution, the City does not support any methodology that uses the current local input factors as developed.
  - a. The factors presented as "local input" in Alternatives 1 and 3 are a carry-over from prior RHNA cycles, and include an evaluation of vacant land that could be available for up-zoning. This process worked when State law only obligated jurisdictions to rezone properties; the local input factors currently developed by SCAG do not reflect the current obligation to facilitate the construction of housing, and is therefore not an acceptable approach.
  - b. The most significant problem with the current local input process is that does not recognize that jurisdictions with more vacant residentially zoned land have that vacant land because the economics do not support construction of residential projects. For a local input process to have any value for the 6<sup>th</sup> Cycle RHNA, it must consider the infrastructure needed to support housing, such as streets and bridges, public transit, water systems, electricity systems, sewer systems, flood channels, food systems, health and medical facilities, etc., and it must correlate housing with funding available to accommodate infrastructure upgrades. For these reasons, it is imperative that housing be allocated where infrastructure currently exists, or will be provided in the immediate future.

The City appreciates the SCAG staff efforts, and the opportunity to provide feedback on the three draft methodologies. Should you have any questions, please feel free to contact me at [jeastman@riversideca.gov](mailto:jeastman@riversideca.gov) or 951-826-5264.

Sincerely,



Jay Eastman, AICP  
Principal Planner

cc: Al Zelinka, City Manager  
Rusty Bailey, Mayor  
Rafael Guzman, Assistant City Manager  
David Welch, Community & Economic Development Director  
Mary Kopaskie-Brown, City Planner  
Peggy Huang, SCAG RHNA Subcommittee Chair  
Ma'Ayn Johnson, SCAG Housing Program Manager